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VIA ECF & HAND DELIVERY

January 11, 2016

The Honorable Martin Glenn
United States Bankruptcy Court
Courtroom 501
One Bowling Green
New York, NY 10004

Re: *In re: Residential Capital, LLC*, Case No. 12-12020 (MG) (Bankr. S.D.N.Y.)

Dear Judge Glenn:

We represent Landon Rothstein, Jennifer Davidson, Robert Davidson, and Ihor Kobryn (the “Rothstein Plaintiffs”) in connection with Claim Nos. 4074 and 3966 (the “Bankruptcy Proofs of Claim”). We write to provide the Court with courtesy copies of the following documents relating to our motion for preliminary approval of the proposed class action settlement of the Bankruptcy Proofs of Claim, which were electronically filed with the Court today, Docket No. 9491:

1. Notice of Motion by Plaintiffs Landon Rothstein, et al., Pursuant to Fed. R. Bankr. P. 7023 and 9019 for an Order: (I) Preliminarily Approving the Class Action Settlement with Respect to Plaintiffs’ Bankruptcy Proofs of Claim, (II) Certifying the Settlement Class and Appointing Class Representatives and Class Counsel for Purposes of the Settlement, (III) Approving the Form and Manner of Notice to the Class, (IV) Scheduling a Fairness Hearing, and (V) Appointing a Settlement Administrator;

2. Motion by Plaintiffs Landon Rothstein, et al., Pursuant to Fed. R. Bankr. P. 7023 and 9019 for an Order: (I) Preliminarily Approving the Class Action Settlement with Respect To Plaintiffs’ Bankruptcy Proofs of Claim, (II) Certifying the Settlement Class and Appointing Class Representatives and Class Counsel for Purposes of the Settlement, (III) Approving the Form and Manner of Notice to the Class, (IV) Scheduling a Fairness Hearing, and (V) Appointing a Settlement Administrator;

3. Declaration of Mark A. Strauss in Support of Motion by Landon Rothstein, et al., Pursuant to Fed. R. Bankr. P. 7023 and 9019 for an Order: (I) Preliminarily Approving the Class Action Settlement with Respect to Plaintiffs’ Bankruptcy Proofs of Claim, (II) Certifying the Settlement Class and Appointing Class Representatives and Class Counsel for Purposes of the

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Settlement, (III) Approving the Form and Manner of Notice to the Class, (IV) Scheduling a Fairness Hearing, and (V) Appointing a Settlement Administrator;

4. Stipulation and Agreement of Settlement with the Rothstein Plaintiffs, and supporting exhibits attached thereto (which is annexed as Exhibit 1 to the declaration listed immediately above); and

5. [Proposed] Order Preliminarily Approving Proposed Settlement with the Rothstein Plaintiffs and Providing For Notice.

In connection with preliminary approval of the Settlement, the parties request that the Court set a final approval hearing date (“Fairness Hearing”), dates for the mailing of the Summary Direct U.S. Mail Postcard Notice, the publication of the Publication Notice, and the establishment of a website containing information about the Settlement, including the Notice, and deadlines for objecting to the Settlement and for requesting exclusion from the Settlement.¹

The proposed Order of Preliminary Approval sets deadlines for most of the settlement-related filings and activities that flow from the Fairness Hearing date or the date on which the Preliminary Approval Order is granted. The proposed Preliminary Approval Order leaves the Fairness Hearing date blank (*see* Prelim. App. Order at p. 4). The following is a proposed schedule for the various settlement-related events, using the time-frames set forth in the proposed Preliminary Approval Order, that would be applicable in the event that the Court were to enter the Preliminary Approval Order on February 10, 2016, and set the Fairness Hearing for April 25, 2016.

Event	Time for Compliance	Proposed Date
Deadline for the Borrower Claims Trust to advance \$95,000 in cash for the cost of disseminating notice Deadline for Plaintiffs to provide the Borrower Claims Trust with a list of anonymized numbers corresponding to the Class Members	Within 5 business days of the entry of the Preliminary Approval Order (Prelim. App. Order ¶¶ 7(a) & (b))	2/15/2016
Deadline for the Borrowers Claims Trust to provide a list of the Class Members	Within 5 business days of the provision of the list of anonymized numbers corresponding to the Class Members (Prelim. App. Order ¶ 7(c))	2/20/2016

¹ The blanks for certain deadlines currently contained in the agreed-upon form of Notice will be filled in once the Court sets those dates.

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Deadline for the mailing of the Summary Direct U.S. Mail Postcard Notice	Within 10 business days of the provision of the list of Class Members (Prelim. App. Order ¶ 7(d))	3/1/2016
Deadline for the publication of the Publication Notice Deadline for the establishment of the Settlement website	Within 10 business days of the entry of the Preliminary Approval Order (Prelim. App. Order ¶¶ 7(e) & (f))	2/20/2015
Deadline to file papers in support of final approval of Settlement, Plan of Allocation, and Lead Counsel's fee and expense request	28 calendar days prior to the Fairness Hearing (Prelim. App. Order ¶ 25)	3/28/2015
Deadline for objections and requests for exclusion from the Settlement Class	14 calendar days prior to the Fairness Hearing (Prelim. App. Order ¶¶ 11 & 16)	4/11/2016
Deadline to file reply papers in further support of final approval of Settlement, Plan of Allocation, and Lead Counsel's fee and expense request	7 calendar days prior to the Fairness Hearing (Prelim. App. Order ¶ 25)	4/18/2016
Fairness Hearing		4/25/2016

In the event that the Court has any questions regarding the foregoing or these submissions, the parties are available at the Court's convenience to address them.

Respectfully submitted,

/s/ Mark A. Strauss

Mark A. Strauss

Encls.

cc: Norman S. Rosenbaum, Esq. (via email without enclosures)